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CITY OF HENDERSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

14 KELLY WOODBURN and THOMAS
WOODBURN, and JOSHUA
15 RODRIGUEZ, individually and on behalf
of all others similarly situated,

Plaintiffs,

VS.

19 CITY OF HENDERSON; DOES I through
V, inclusive; and ROE CORPORATIONS
I through V, inclusive,

Defendants.

Case No. 2:19-cv-01488-CDS-DJA

**STIPULATION AND (~~PROPOSED~~)
ORDER TO EXTEND DISCOVERY
DEADLINES**

(FIFTH REQUEST)

Plaintiffs Kelly Woodburn, Thomas Woodburn, and Joshua Rodriguez, together with Defendant City of Henderson, hereby stipulate and agree to amend the Stipulated Amended Discovery Plan and Scheduling Order, first entered July 27, 2022 (ECF No. 163), and subsequently amended by order on November 8, 2023 (ECF No. 196). The parties seek to extend all current discovery deadlines for an additional 180 days from their current deadlines. The purpose of the proposed 180-day extension is to ensure that the Parties have adequate time to perform discovery in light of Plaintiffs'

1 former counsel's withdrawal and current counsel's time familiarizing themselves with the case and
 2 participating in discovery.

3 This is the parties' fifth request for an extension to the Stipulated Amended Discovery Plan
 4 and Scheduling Order in this matter.¹ The parties submit this stipulation in advance of the upcoming
 5 deadline to submit initial expert reports, which is currently scheduled on June 13, 2024 (ECF No. 196
 6 at 9), and to clarify the remaining discovery period.

DISCOVERY COMPLETED TO DATE

8 The following is the discovery completed to date:

- 9 • On November 12, 2020, Plaintiffs served their First Request for Production of Documents.
- 10 • On November 12, 2020, Plaintiffs served their Second Request for Production of
Documents.
- 11 • On November 24, 2020, Defendant served its Initial Disclosures.
- 12 • On November 30, 2020, Defendant served its Interrogatories and First Set of Requests for
Production to Thomas Woodburn. On the same say, Defendant also served its
Interrogatories and First Set of Requests for Production to Kelly Woodburn.
- 13 • On December 17, 2020, Plaintiffs served their Initial Disclosures.
- 14 • On January 11, 2021, Defendant served its Responses to Plaintiffs' First and Second Sets
of Requests for Production.
- 15 • On January 21, 2021, Kelly Woodburn served her Responses to Defendant's First Set of
Interrogatories and Requests for Production. On the same day, Thomas Woodburn served
his Responses to Defendant's First Set of Interrogatories and Requests for Production.
- 16 • On January 21, 2021, Plaintiffs served their First Supplemental Disclosures.
- 17 • On March 4. 2021, Plaintiffs served their Third Set of Requests for Production.
- 18 • On April 12, 2021, Defendant served it Responses to Plaintiffs' Third Set of Requests for
Production.
- 19 • On April 12, 2021, Plaintiffs served their Second Supplemental Disclosures.

24 ¹ The parties second stipulation to extend discovery deadlines was filed on December 12, 2022 (ECF
 25 No. 164), and the Court granted the request the same day (ECF No. 165). That order extended the
 26 discovery period from April 17, 2023, to September 14, 2023. During a May 9, 2023 hearing on
 27 Defendant's Motion to Compel Discovery Responses (ECF No. 166), the parties orally agreed to an
 additional extension to the discovery deadlines (the third request). Then, on November 7, 2023, the
 parties submitted their fourth stipulated request to extend discovery deadlines, which reflects the
 current deadlines to discovery. Thus, although this stipulation represents the fourth written request to
 extend discovery deadlines, it is the parties' fifth overall request to do so.

- 1 • On May 2, 2022, Defendant served its First Supplemental Disclosures.
- 2 • On May 2, 2022, Defendant served its First Set of Interrogatories and Requests for
- 3 Production to Joshua Rodriguez.
- 4 • On May 19, 2022, Defendant served its First Set of Interrogatories and Requests for
- 5 Production on the following opt-in Plaintiffs:
- 6 ○ Darius Brown
- 7 ○ Eliot Holman
- 8 ○ Cornel Cook
- 9 ○ JoAnn Vollmann
- 10 ○ Justyn Arciszewska
- 11 ○ Anthony Todd
- 12 ○ Ryan Korthauer
- 13 ○ James Waylon Shaw
- 14 ○ Jed Robbins
- 15 ○ Robert Thomas
- 16 ○ Brandon Harbin
- 17 ○ Philip Grozenski
- 18 ○ Ronald Peeler
- 19 ○ Ann Waite
- 20 ○ Richard Reyes
- 21 ○ Braden Dong
- 22 ○ Henry Robertson
- 23 • On May 20, 2022, Defendant served its First Set of Interrogatories and Requests for
- 24 Production on the following opt-in Plaintiffs:
- 25 ○ Octaviano Zamora Rios
- 26 ○ William Worthington
- 27 ○ Guadalupe Trejo
- 28 ○ Marc Smith

- 1 ○ Michael DiGregorio
- 2 ○ Brandyn Dombrowski
- 3 ○ Tammy Dombrowski
- 4 ○ Christina Dorsey
- 5 ○ Lewis Edmonson
- 6 ○ Johnnie Graves
- 7 ○ David Bishop
- 8 ○ Raul Acevedo-Saldivar

- 9 ● On May 25, 2022, Defendant served its First Set of Interrogatories and Requests for
10 Production on the following opt-in Plaintiffs:
 - 11 ○ Samantha Mosqueda
 - 12 ○ Michael Olive
 - 13 ○ Andrew Johnson
 - 14 ○ Gabriel Arias
 - 15 ○ Joshua Woodside
 - 16 ○ Edward Weathers
 - 17 ○ Jessica Veit
 - 18 ○ Erika Tagen
 - 19 ○ Arturo Sanchez
 - 20 ○ Alex Rozum
 - 21 ○ Michael Ramseyer
 - 22 ○ Michael Page
 - 23 ○ Victor Milligan
 - 24 ○ Jose Martinez-Lopez
 - 25 ○ Ashley Mangan
 - 26 ○ Pita Luli
 - 27 ○ Charlynn Foranro
 - 28 ○ Joshua Epperson
 - 29 ○ Arbresha Dema
 - 30 ○ Carlos Deloera
 - 31 ○ Jennifer Chavys
 - 32 ○ Colin Brown
- 33 ● On May 31, 2022, Defendant served its Second Supplemental Disclosures.
- 34 ● On June 1, 2022, Joshua Rodriguez served his Responses to Defendant's First Set of
35 Interrogatories and Requests for Production.
- 36 ● On June 6, 2022, Defendant served its Third Supplemental Disclosures.
- 37 ● On June 17, 2022, Plaintiffs served their Third Supplemental Disclosures.
- 38 ● On October 7, 2022, Plaintiff Kelly Woodburn served her First Supplemental Responses
39 to Defendant's First Set of Interrogatories and Requests for Production to Kelly Woodburn.
- 40 ● On October 10, 2022, Plaintiffs took the deposition of Pam Lauer.
- 41 ● On October 11, 2022, Plaintiffs took the deposition of Damon Smith.
- 42 ● On October 11, 2022, Plaintiffs served their First Set of Interrogatories and Fourth Set of
43 Requests for Production.
- 44 ● On October 11, 2022, Plaintiffs served their Fourth Supplemental Disclosures.

- 1 • On November 3, 2022, Plaintiffs served their Fifth Supplemental Disclosures.
- 2 • On November 7, 2022, Plaintiffs took the deposition of David Burns.
- 3 • On November 16, 2022, Plaintiff Kelly Woodburn served her Second Supplemental
4 Responses to Defendant's First Set of Interrogatories to Kelly Woodburn.
- 5 • On November 28, 2022, opt-in Plaintiffs Johnnie Graves, Henry Robertson, and Victoria
6 Price served their Responses to Defendant's First Set of Request for Production.
- 7 • On November 28, 2022, opt-in Plaintiff Johnnie Graves served his Response to
8 Defendant's First Set of Interrogatories.
- 9 • On December 2, 2022, opt-in Plaintiff Victoria Price served her Response to Defendant's
10 First Set of Interrogatories.
- 11 • On December 8, 2022, Defendant served its Responses to Plaintiffs' First Set of
12 Interrogatories and Fourth Set of Requests for Production.
- 13 • On December 8, 2022, Defendant served its Fourth Supplemental Disclosures.
- 14 • On December 23, 2022, Plaintiff Joshua Rodriguez served his first supplemental discovery
15 responses.
- 16 • On January 18, 2023, Plaintiff Marc Smith served his discovery responses.
- 17 • On January 23, 2023, Plaintiff Evan Green served his discovery responses.
- 18 • On January 23, 2023, Plaintiff Trevor Burns served his discovery responses.
- 19 • On January 25, 2023, Plaintiff Brandyn Dombrowski served his discovery responses.
- 20 • On January 27, 2023, Plaintiff Jed Robbins served his discovery responses.
- 21 • On January 27, 2023, Plaintiff Jack McDonald served his discovery responses.
- 22 • On January 31, 2023, Plaintiff Henry Robertson served his responses to Interrogatories.
- 23 • On February 1, 2023, Plaintiff Erich Ammon served his discovery responses.
- 24 • On February 2, 2023, Plaintiff Braden Dong served his discovery responses.
- 25 • On March 1, 2023, Plaintiff Guadalupe Trejo served her discovery responses.
- 26 • On March 13, 2023, Defendant served its Fifth Supplemental Disclosures.
- 27 • On March 22, 2023, Plaintiff Ronald Peeler served his discovery responses.
- 28 • On April 5, 2023, Plaintiff James Waylon Shaw served his discovery responses.

- 1 • On April 5, 2023, Plaintiff Juan Chavez served his discovery responses.
- 2 • On April 10, 2023, Plaintiff Joshua Woodside served his discovery responses.
- 3 • On April 17, 2023, Plaintiff Raul Acevedo-Saldivar served his discovery responses. On
4 April 18, 2023, he served amended responses to his interrogatory responses.
- 5 • On April 17, 2023, Plaintiff Philip Grozenski served his discovery responses.
- 6 • On April 18, 2023, Plaintiff Samantha Mosqueda served her discovery responses.
- 7 • On April 24, 2023, Plaintiff Lewis Edmondson served his discovery responses.
- 8 • On April 28, 2023, Plaintiff Robert Thomas served his discovery responses.
- 9 • On May 3, 2023, Plaintiff Gabriel Arias served his discovery responses.
- 10 • On May 3, 2023, Plaintiff Edward Weathers served his discovery responses.
- 11 • On June 6, 2023, Plaintiffs served their Sixth Supplemental FRCP 26 disclosures.
- 12 • On June 8, 2023, Plaintiffs served their Seventh Supplemental FRCP 26 disclosures.
- 13 • On June 28, 2023, Opt-In Plaintiffs Ammon, Chavez, Graves, Robertson, Trejo, and
14 Woodside served supplemental responses to Defendant's first interrogatories and requests
15 for production.
- 16 • On July 11, 2023, Opt-In Plaintiffs Acevedo-Saldivar, Dong, and Shaw served
17 supplemental responses to Defendant's first interrogatories and requests for production.
- 18 • On July 13, 2023, Opt-In Plaintiff Jack McDonald served supplemental responses to
19 Defendant's first interrogatories and requests for production.
- 20 • On July 18, 2023, Opt-In Plaintiff Marc Smith served supplemental responses to
21 Defendant's first interrogatories and requests for production.
- 22 • On July 19, 2023, Opt-In Plaintiffs Lewie Edmondson and Philip Grozenski served
23 supplemental responses to Defendant's first interrogatories and requests for production.
- 24 • On July 26, 2023, Opt-In Plaintiff Robbins served supplemental responses to Defendant's
25 first interrogatories and requests for production.
- 26 • Only July 27, 2023, Opt-In Plaintiff Burns served supplemental responses to Defendant's
27 first interrogatories and requests for production.

- 1 • On August 4, 2023, Opt-In Plaintiff Abresha Dema served first responses to interrogatories
2 and requests for production.
- 3 • On August 7, 2023, Opt-In Plaintiffs Evan Green and Robert Thomas served supplemental
4 responses to Defendant's first interrogatories and requests for production.
- 5 • On August 11, 2023, Opt-In Plaintiffs Victoria Price and Brandyn Dombroski served
6 supplemental responses Defendant's first interrogatories and requests for production.
- 7 • On August 11, 2023, Opt-In Plaintiff Steven Kopacz served first responses to
8 interrogatories and requests for production.
- 9 • On August 14, 2023, Opt-In Plaintiff Brandon Harbin served first responses to
10 interrogatories and requests for production.
- 11 • On November 13, 2023, Plaintiffs' former counsel, Claggett & Sykes withdrew (ECF No.
12 197).
- 13 • On December 11, 2023, Plaintiffs' current counsel, Sgro & Roger, entered its appearance
14 (ECF No. 198).
- 15 • On February 26, 2024, Named Plaintiff Joshua Rodriguez served his third supplemental
16 responses to Defendant's first set of interrogatories and supplemental responses to
17 Defendant's first set of requests for production.
- 18 • On February 26, 2024, Named Plaintiff Kelly Woodburn served her fourth supplemental
19 responses to Defendant's first set of interrogatories and second supplemental responses to
20 Defendant's first set of requests for production.
- 21 • On February 26, 2024, Named Plaintiff Thomas Woodburn served his fourth supplemental
22 responses to Defendant's first set of interrogatories and second supplemental responses to
23 Defendant's first set of requests for production.
- 24 • On February 26, 2024, Opt-In Plaintiff Evan Green served his second supplemental
25 responses to Defendant's first set of interrogatories and second supplemental responses to
26 Defendant's first set of requests for production.
- 27 • On February 26, 2024, Opt-In Plaintiff Lewis Edmondson served his second supplemental
28 responses to Defendant's first set of interrogatories and second supplemental responses to
 Defendant's first set of requests for production.

- 1 • On February 26, 2024, Opt-In Plaintiff Brandon Harbin served his first supplemental
2 responses to Defendant's first set of interrogatories and supplemental responses to
3 Defendant's first set of requests for production.
- 4 • On February 26, 2024, Opt-In Plaintiff Raul Acevedo-Saldivar served his second
5 supplemental responses to Defendant's first set of interrogatories and second supplemental
6 responses to Defendant's first set of requests for production.
- 7 • On February 26, 2024, Opt-In Plaintiff Trevor Burns served his second supplemental
8 responses to Defendant's first set of interrogatories and second supplemental responses to
9 Defendant's first set of requests for production.
- 10 • On February 26, 2024, Opt-In Plaintiff Juan Chavez served his second supplemental
11 responses to Defendant's first set of interrogatories and second supplemental responses to
12 Defendant's first set of requests for production.
- 13 • On February 26, 2024, Opt-In Plaintiff Brandyn Dombrowski served his second supplemental
14 responses to Defendant's first set of interrogatories and second supplemental responses to
15 Defendant's first set of requests for production.
- 16 • On February 26, 2024, Opt-In Plaintiff Guadalupe Trejo served her second supplemental
17 responses to Defendant's first set of interrogatories and second supplemental responses to
18 Defendant's first set of requests for production.
- 19 • On February 26, 2024, Opt-In Plaintiff Jack McDonald served his second supplemental
20 responses to Defendant's first set of interrogatories and second supplemental responses to
21 Defendant's first set of requests for production.
- 22 • On February 26, 2024, Opt-In Plaintiff Victoria Price/Guzel served her second supplemental
23 responses to Defendant's first set of interrogatories and second supplemental responses to
24 Defendant's first set of requests for production.
- 25 • On February 26, 2024, Opt-In Plaintiff James Waylon Shaw served his second supplemental
26 responses to Defendant's first set of interrogatories and second supplemental responses to
27 Defendant's first set of requests for production.
- 28 • On February 26, 2024, Opt-In Plaintiff Braden Dong served his second supplemental
 responses to Defendant's first set of interrogatories and second supplemental responses to
 Defendant's first set of requests for production.

- 1 • On February 26, 2024, Opt-In Plaintiff Steven Kopacz served his first supplemental
2 responses to Defendant's first set of interrogatories and first supplemental responses to
3 Defendant's first set of requests for production.
- 4 • On February 26, 2024, Opt-In Plaintiff Marc Smith served his second supplemental
5 responses to Defendant's first set of interrogatories and second supplemental responses to
6 Defendant's first set of requests for production.
- 7 • On February 26, 2024, Opt-In Plaintiff Robert Thomas served his second supplemental
8 responses to Defendant's first set of interrogatories and second supplemental responses to
9 Defendant's first set of requests for production.
- 10 • On February 26, 2024, Plaintiffs served their Eighth Supplemental Disclosures under Rule
11 26.
- 12 • On February 27, 2024, Opt-In Plaintiff Jed Robbins served his second supplemental
13 responses to Defendant's first set of interrogatories and second supplemental responses to
14 Defendant's first set of requests for production.
- 15 • On March 1, 2024, Opt-In Plaintiff Braden Dong served his revised second supplemental
16 responses to Defendant's first set of interrogatories.
- 17 • On March 6, 2024, Opt-In Plaintiff Victoria Price/Guzel served her revised second
18 supplemental responses to Defendant's first set of requests for production.
- 19 • On March 6, 2024, Opt-In Plaintiff Henry Robertson served his revised second
20 supplemental responses to Defendant's first set of requests for production.
- 21 • On March 8, 2024, Opt-In Plaintiff Jed Robbins served his revised second supplemental
22 responses to Defendant's first set of requests for production.
- 23 • On March 8, 2024, Opt-In Plaintiff Jack McDonald served his revised second supplemental
24 responses to Defendant's first set of requests for production.
- 25 • On March 8, 2024, Opt-In Plaintiff Lewis Edmondson served his Revised Second
26 Supplemental Responses to Defendant's First Set of Interrogatories.
- 27 • On March 8, 2024, Opt-In Plaintiff James Waylon Shaw served his Revised Second
28 Supplemental Responses to Defendant's First Set of Interrogatories.
- On March 18, 2024, Opt-In Plaintiff Joshua Woodside served his second supplemental
 responses to Defendant's first set of Requests for Production.
- On March 21, 2024, Opt-In Plaintiff Joshua Woodside served his second supplemental
 responses to Defendant's first set of requests for production.

- 1 • On March 21, 2024, Plaintiffs served their Ninth Supplemental Disclosure under Rule 26.
- 2 • On March 22, 2024, Opt-In Plaintiff Marc Smith served his Revised Second Supplemental
3 Responses to Defendant's First Set of Interrogatories.
- 4 • On March 22, 2024, Plaintiff Thomas Woodburn served his revised second supplemental
5 responses to Defendant's first set of interrogatories.
- 6 • On March 22, 2024, Plaintiff Kelly Woodburn served her revised second supplemental
7 responses to Defendant's first set of interrogatories.
- 8 • On March 22, 2024, Plaintiff Joshua Rodriguez served his revised third supplemental
9 responses to Defendant's first set of interrogatories.
- 10 • On March 22, 2024, Opt-In Plaintiff Brandyn Dombrowski served his Revised Second
11 Supplemental Responses to Defendant's First Set of Interrogatories.
- 12 • On March 28, 2024, Opt-In Plaintiff Philip Grozenski served his second supplemental
13 responses to Defendant's first set of requests for production of documents.
- 14 • On April 16, 2024, Defendant served its First Supplemental Responses to Plaintiffs' First
15 Set of Requests for Production of Documents.
- 16 • On April 16, 2024, Defendant served its Sixth Supplemental Disclosures.

DISCOVERY THAT REMAINS TO BE COMPLETED

Discovery is ongoing in this matter. Defendant served all opt-in Plaintiffs with its First Sets of Interrogatories and Requests for Production. The parties then agreed to a sampling size for Phase I discovery of the opt-in Plaintiffs, specifically that Plaintiffs would prepare discovery responses for the three (3) named Plaintiffs and a sampling size of 27 of the opt-in Plaintiffs. Plaintiffs have also agreed to make available the 27 opt-in Plaintiffs for depositions.

Defendant plans (and the parties have agreed) to depose the three (3) named Plaintiffs, along with the 27 opt-in Plaintiffs. However, Plaintiffs have recently served, and continue to serve, supplemental discovery responses, and Defendant has just recently served supplemental discovery responses, which the parties anticipate will allow for further supplementation to Plaintiffs' written discovery responses. Defendant intends to take the depositions of the named Plaintiffs and the 27 opt-in Plaintiffs once it is satisfied that it has received sufficient discovery responses from each of the named Plaintiffs and the 27 opt-in Plaintiffs. Plaintiffs have also planned to take the deposition of

1 Defendant's Rule 30(b)(6) witness. Lastly, the parties anticipate—and the Plaintiffs' supplemental
 2 productions have confirmed—that expert witnesses will be necessary.

REASONS FOR EXTENSION TO COMPLETE DISCOVERY

4 This extension is necessary to allow both parties ample time to complete all appropriate
 5 discovery. The requested extension is sought in good faith and not for purposes of undue delay, and
 6 is supported by good cause.

7 Since the Order granting the Stipulated Amended Discovery Plan and Scheduling Order (ECF
 8 No. 163) was entered by this Court on July 27, 2022, the parties have engaged in a series of written
 9 discovery, document production, and depositions of former supervisory personnel of Defendant, as
 10 summarized above.

11 Throughout the course of this litigation, the parties have encountered disagreements
 12 concerning the sufficiency of both the Plaintiffs' and the Defendant's written discovery responses,
 13 which have been documented in meet-and-confer letters, moving papers, and in court order. Plaintiffs'
 14 former counsel formally withdrew from representation of the Plaintiffs on November 8, 2023 [ECF
 15 197] and Plaintiffs retained new counsel who formally appeared in the case on December 11, 2023
 16 [ECF 198].

17 Since Plaintiffs' new counsel has appeared in the case, Plaintiffs have served two (2)
 18 supplemental disclosures, and the named Plaintiffs and the majority of the 27 opt-in Plaintiffs that are
 19 currently subject to Phase I discovery have served supplements to their responses to Defendant's
 20 written discovery requests. Defendant has also recently served a supplemental disclosure and a
 21 supplemental response to Plaintiffs' First Set of Requests for Production of Documents.

22 Further, during an April 11, 2024, Court-ordered meet and confer, Plaintiffs disclosed that they
 23 intend to serve additional written discovery on Defendant. In addition, Plaintiffs are working with
 24 certain non-responsive opt-in plaintiffs who may be dismissed from this action. If those opt-in
 25 plaintiffs are dismissed, the Parties may need to replace them with opt-in plaintiffs not currently in the
 26 agreed-upon sampling, which will result in additional discovery on those new opt-in plaintiffs.

27 Given the above, the parties require more time to properly complete discovery on all individual
 28 claims and pre-certification issues, which includes (i) opt-in Plaintiffs serving additional supplemental

1 responses to Defendant's written discovery, as appropriate, (pursuant to the parties' agreement on a
 2 sampling size of 27), (ii) Defendant taking the depositions of the named Plaintiffs, (iii) Defendant
 3 taking the depositions of the 27 opt-in Plaintiffs; (iv) Plaintiffs taking the deposition of Defendant's
 4 Rule 30(b)(6) witness; and (v) preparation of expert witness disclosures and rebuttal disclosures.

PROPOSED REVISED DISCOVERY PLAN

1. Discovery Cut-Off Deadline

a. Phase I of Discovery (Named Plaintiffs' Claims and Class Certification):

8 The Phase I Discovery cut-off deadline shall be extended from August 12, 2024, to **February
 9 10, 2025.**

b. Phase II of Discovery (Damages and Liability):

11 The Parties propose that they submit a Proposed Stipulated Discovery Plan for Class-wide
 12 Phase II Discovery twenty-one (21) days following the Court's ruling on any class
 13 certification/decertification or summary judgment motions after Phase I of Discovery is completed in
 14 order to set deadlines and dates for Phase II.

2. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts) Deadline:

16 The parties agree to and propose a deadline to disclose experts for Phase I sixty (60) days prior
 17 to the close of Phase I Discovery: **December 12, 2024** (60 days prior to the proposed close of Phase I
 18 Discovery). The parties further propose a deadline to disclose any rebuttal experts thirty (30) days
 19 after the initial disclosure of experts: **January 13, 2025.**

3. Class Certification, Collective Decertification and Dispositive Motions:

21 To the extent that Plaintiffs continue as a collective, the Parties agree to and propose a deadline
 22 to file collective certification, collective decertification, and dispositive motions thirty (30) days after
 23 the close of Phase I Discovery: **March 12, 2025.** Defendant also reserves the right to oppose
 24 Plaintiffs' anticipated motion for final certification of the FLSA collective for trial.

4. Pretrial Order:

26 The Parties agree to and propose that the date for filing a Joint Pretrial Order shall be no later
 27 than thirty (30) days after the date set for filing any dispositive motions after Phase II of Discovery.
 28 The Parties will include this proposed date in their Proposed Stipulated Discovery Plan for Phase II.

1 In the event dispositive motions are filed after Phase II, Plaintiffs propose that the date for
2 filing a Joint Pretrial Order shall be suspended until thirty (30) days after decision of the dispositive
3 motions or further order of the Court.

4 5. Fed. R. Civ. P. 26(a)(3) Disclosures:

5 The Parties agree to and propose that Fed. R. Civ. P. 26(a)(3) disclosures shall be included by
6 the Parties in their Joint Pretrial Order.

7 6. Extensions or Modifications of the Discovery Plan and Scheduling Order:

8 In accordance with Local Rule 26-3, a stipulation or motion for modification or extension of
9 any deadline stated in this Discovery Plan and Scheduling Order must be made no later than 21 days
10 before the expiration of the subject deadline.

11 Dated: May 10, 2024

Dated: May 10, 2024

12 SGRO & ROGER

LITTLER MENDELSON, P.C.

13 By: /s/ Alanna Bondy

14 ANTHONY SGRO, ESQ.
15 ALANNA BONDY, ESQ.
16 HAN LEE, ESQ.

By: /s/ Andrew S. Clark

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17 *Attorneys for Plaintiffs*

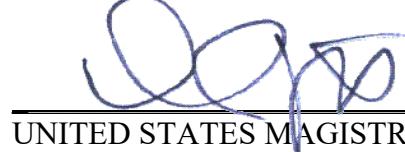
KELLY WOODBURN, THOMAS
WOODBURN, AND JOSHUA
RODRIGUEZ

Attorneys for Defendant

CITY OF HENDERSON

21 **ORDER**

22 IT IS SO ORDERED.



23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 5/14/2024